IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

Date: 1/2/07

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS
James Frey	Robert Sorrentino
1.1.	Senior Vice President, Taxes, Random House, Inc.
Date: 1/2/07	Date:
James Frey	Robert Sorrentino
Big Jim Industries, Inc.	President, Doubleday & Company, Inc.
Date: 1/2/07	
	Date:
In Rome	
Maya Frey	Robert Sorrentino
	Vice President, Taxes, Random House VG, Inc.
Date: 1/2/07	
Date:	Date:
- Peul herry	
Derek J. Meyer	Mark B. Blocker
McDermott Will & Emery LLP	Sidley Austin LLP
227 West Monroe Street, Suite 4400	One South Dearborn
Chicago, Illinois 60606	Chicago, Illinois 60603
Attorney for the Frey Defendants	Attorney for the Random House Defendants
· I · · · · · · · · · · · · · · · · · ·	

Date:____

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS.
James Frey	Robert Sorrerano Senior Vice Plesiacnt, Taxes, Random House, Inc.
Date:	Date: 12/15/06
James Frey	Robert Sorrentino
Big Jim Industries, Inc.	President, Doubleday & Company, Inc.
Date:	Date: 12/15/06
Maya Frey	Robert Sorrentino Vice President, Taxes, Random House VG, Inc.
Date:	Mark B Blocker
Derek J. Meyer	Mark B. Blocker
McDermott Will & Emery LLP	Sidley Austin LLP
227 West Monroe Street, Suite 4400	One South Dearborn
Chicago, Illinois 60606	Chicago, Illinois 60603
Attorney for the Frey Defendants	Attorney for the Random House Defendants
Date:	Date: 12/28/2006

FOR THE PLAINTIFFS:

Plaintiff Marolo Vedral	Michele Snow
Larry D. Drury I.Ad. 205 W. Randolph Street. Suite 1430 Chicago. Illinois 60606 Proposed Co-Lead Class Counsel Attorney for Plaintiff Marcia Vedral	Evan J. Smith, Esquire Brodsky & Smith, LLC Two Bala Plana, Suite 602 Bala Cynwyd, PA 19004 (610) 667-6200 Proposed Co-Lond Class Comsel Attorney for Plaintiff Michele Snow
Date: 12-6-06	Date: 12-6-06
Plaintiff Jennifer Colu	Plaintiff Aun Marie Strack Date:
Thomas Mullaney 708 Third Avenue, Suite 2500 New York, New York 10017 Phone: (212) 223-0800 Liaison Class Counsel Attorneys for Plaintiff Jennifer Cohn	Thomas A. Ziminerman, Jr. Ziminerman and Associates, P.C. 100 West Monroe Street, Suite 1300 Chicago, Illinois 60603 Attorney or Plaintiff Ann Marie Struck
Date:	Date:

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FOR THE PLAINTIFFS:

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Plaintiff Marcia Vedral	Plaintiff Michele Snow
Date:	Date:
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Larry D. Drury	Evan J. Smith, Esquire
Larry D. Drury Ltd.	Brodsky & Smith, LLC
205 W. Randolph Street, Suite 1430	Two Bala Plaza, Suite 602
Chicago, Illinois 60606	Bala Cynwyd, PA 19004
Proposed Co-Lead Class Counsel	(610) 667-6200
Attorney for Plaintiff Marcia Vedral	Proposed Co- Lead Class Counsel
	Attorney for Plaintiff Michele Snow
Date:	Date:
Plaintiff Diane Marolda	Plaintiff Ann Marie Strack
Date: 12/7/06	Date:
Thomas Mullaney	Thomas A. Zimmerman, Jr.
708 Third Avenue, Suite 2500	Zimmerman and Associates, P.C.
New York, New York 10017	100 West Mouroe Street, Suite 1300
Phone: (212) 223-0800	Chicago, Illinois 60603
Liaison Class Counsel	Attorney or Plaintiff Ann Marie Strack
Attorneys for Plaintiff Diane Marolda	y and an area
Date: 12.5.2000	Date:

FOR THE PLAINTIFFS:

Plaintiff Michele Snow
Date:
Evan J. Smith, Esquire
Brodsky & Smith, LLC
Two Bala Plaza, Suite 602
Bala Cynwyd, PA 19004
(610) 667-6200
Proposed Co- Lead Class Counsel
Attorney for Plaintiff Michele Snow
Date:
Plaintiff Ann Marie Strack
Date: 12-8-06
1/1/
Thomas A. Zimmerman, Jr.
Zimmerman and Associates, P.C.
100 West Monroe Street, Suite 1300
Chicago, Illinois 60603
Attorney or Plaintiff Ann Marie Strack
Date: 12-11-2006

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June (Oz)	Plaintiff Jill Giles
-Framult simility gloyd	COMMINION PROGRESSION
De Silve	Date:
Alan S. Ripka	Alan J. Statman
Napoli Bern Ripka LLP	Colleen M. Hegge (of counsel)
115 Broadway	2900 Chemed Center
New York, New York 10006	255 East Fifth Street
Attorney for Plaintiff Jimmy Floyd	Cincinnati, Ohio 45202
Manney for Channy Smany Croye	Attorneys for Plaintiff Jill Giles
Date: December 5, 2006	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Michael David Myers Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700 Scattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan
2000 000 000 000 000 000 000 000 000 00	
Date:	Date:
Plaintiff Sara Brackenrich	-
Date:	
Vincent L. DiTommaso	
DiTommaso & Lubin, PC	
17W 220 22nd Street, Suite 200	
Oakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sara Brackenrich	

Date:_

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway	Alan J. Statman Colleen M. Hegge (of counsel) 2900 Chemed Center
New York, New York 10006 Attorney for Plaintiff Jimmy Floyd	255 East Fifth Street Cincinnati, Ohio 45202 Attorneys for Plaintiff Jill Giles
Date: 11/29/06	Date:
- PDM-	
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date: 11 29/06	Date:
229/	
Thomas E. Pakenas	Michael David Myers
Dale and Pakenas	Myers & Company, P.L.L.C.
641 W. Lake Street, Suite 400	1809 Seventh Avenue, Suite 700
Chicago, Illinois 60661	Seattle, Washington 98101
Attorneys for Plaintiff Pilar More	Attorney for Plaintiff Shera Paglinawan
Date:	Date:
Plaintiff Sara Brackenrich	_
Date:	
Vincent L. DiTommaso	
DiTommaso & Lubin, PC	
7W 220 22nd Street, Suite 200	
Dakbrook Terrance, Illinois 61081	
Attorney for Plaintiff Sara Brackenrich	

Date:__

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka	Alan J. Starman
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Attorney for Plaintiff Jimmy Floyd	Cincinnati, Ohio 45202
	Attorneys for Plaintiff Jill Giles
<u></u>	SEASON
Date:	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
The state of the state of	radiciti Stera raginiawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Plaintiff Wendy Shaw Date:
Date	Michael David Myers
Date:	Myers & Company, P.L.L.C.
	1809 Seventh Avenue, Suite 700
	Seattle, Washington 98101
	Attorney for Plaintiff Shera Paglinawan
San Back on	Date:
Plain of Sara Brackenrich	
Date: 20 Nov. 06	
Difformaso & Lubin, PC	

	hill Giles / In be atten flac. An
Plaintiff Jimmy Floyd	Maintiff Jill Giles
Date:	Date: 12-7-0 6
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Alan S. Ripke	Alan Statman
Napoli Bern Ripka LLP	Colleen M. Hegge (of counsel)
115 Broadway	2900 Chemed Center
New York, New York 10006	255 East Fifth Street
Attorney for Plaintiff Jimmy Floyd	Cincinnati, Ohio 45202
	Attorneys for Plaintiff Jill Giles
Date:	Date: 12-7-04
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Michael David Myers Myers & Company, P.L.L.C 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan
Date:	Date:
Plaintiff Sara Brackenrich	•
Date:	
Vincent L. DiTommaso	•
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Attorney for Plaintiff Sara Brackenrich	
Date:	

Plaintiff Jimmy Floyd	
	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway	Alan J. Statman
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Date:	Attorneys for Plaintiff Jill Giles Date:
Plaintiff Pilar More Date:	Plaintiff Sheri Paginawan Date: 3 Dec. 3000e
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Plaintiff Wendy Shaw Date:
Date:	Michael David Myers Myers & Company, P.L.C. 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan Date: 12 3 2006
laintiff Sara Brackenrich	
ate:	
ncent L. DiTommaso Tommaso & Lubin, PC	

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway New York, New York 10006 Autorney for Plaintiff Jimmy Floyd Date:	Alan J. Statman Collecn M. Hegge (of counsel) 2900 Chemed Center 255 East Fifth Street Cincirnati, Ohio 45202 Attorneys for Plaintiff Jill Giles Date:
	Date.
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Plaintiff Wondy Shaw Date: 2/06
Date:	Michael David Myers Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Accorney for Platnetff Shera Paglinawan Date:
Plaintiff Sara Brackenrich	
Date:	
/incent L. DiTommaso DiTommaso & Lubin, PC	